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To: Senate Growth and Infrastructure Committee
From: Jeff Cramer, Executive Director, Coalition for Community Solar Access
Regarding: Assembly Bill 465
Date: May 10, 2019

Chair Cancela and Members of the Committee:

The Coalition for Community Solar Access (CCSA) is a national coalition of solar developers, financiers, businesses that support community solar facilities, and non-profit advocacy organizations working to expand access to solar for all American households and businesses through community solar.

CCSA and our members work with customers, utilities, local stakeholders, and policy makers to develop and implement policies and best practices that ensure community solar programs expand cost-effective access to clean energy. Based on our extensive experience with expanding access to clean energy with community solar in states across the U.S., CCSA has developed several resources to aid legislators and regulators in development programs that work for all parties including customers, utilities, and the development community. All of these resources are based off of CCSA's Core Principles which are included below.

CCSA has reviewed AB 465 and its latest amendments and compared it with our core principles, as well as the examples set by more than a dozen community solar programs operating across the country. Unfortunately AB 465 will not provide the benefits typical community solar programs provide, and therefore CCSA must oppose this bill.

CCSA has a number of concerns with this bill.

First, the bill limits the ability of solar developers to provide clean energy solutions to customers, spurring innovation and increased options and opportunity for customers. Just as customers fortunate enough to own their own home may choose who installs solar on their property, we believe that customers who choose community solar as a clean energy option should have the ability to select among a number of providers and product options tailored to them.

Second, this bill will not provide participants in the program similar benefits to those who install systems on their rooftops, further exacerbating inequities in the electric system. By only offsetting the base tariff energy rate and the deferred energy accounting adjustment, the program will provide substantially less to no savings to customers participating in the program.

Given these and CCSA's other concerns, including (1) the fact that solar facilities already contracted for can be used to fulfill solar developments and subscriptions made within this



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program, meaning that the program would provide de minimis additional solar development rather than truly expanding access to solar, (2) the lack of a reasonableness requirement that would allow the Public Utilities Commission to ensure the program offers tangible benefits to the state, (3) the lack of clarity around level and availability of bill savings to all participating customer classes, and (4) the potential for customer confusion given the combination of a few small, local projects with a utility-scale resource, we believe make this bill is an unnecessary and deeply flawed experiment for the state, especially with tried and true best practices to be leveraged from over a dozen other states.

Although CCSA has been engaged in community solar conversations in Nevada since 2016, participating in multiple legislative and community meetings, we cannot support this proposed program. It is with these concerns that we respectfully oppose AB 465 and ask you to oppose as well. A program developed under AB 465 will further exacerbate the inequities in access to clean energy and slow Nevada's ability to meet its climate goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Cramer".

Jeff Cramer
Executive Director
Coalition for Community Solar Access



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CCSA Core Principles:

1. Allow all consumers the opportunity to participate in and directly economically benefit from the construction and operation of new clean energy assets.
2. Provide equal access for developers to build and operate community solar projects and interconnect those projects to the serving utility's grid.
3. Incorporate a fair bill credit mechanism that provides subscribers with an economic benefit commensurate with the value of the long-term, clean, locally-sited energy produced by community solar projects.
4. Support the participation of diverse customer types in community solar programs, and encourage customer choice with providers, product features, and attributes to catalyze innovation and best serve customers.
5. Ensure that community solar projects are operated and maintained well to protect customers and developers' investment.
6. Ensure full and accurate disclosure of customer benefits and risks in a standard, comparable manner that presents customers with performance and cost transparency.
7. Comply with applicable securities, tax, and consumer protection laws to reduce customer risk and protect the customer.
8. Encourage transparent, non-discriminatory utility rules on siting, and interconnecting projects, and collaboration with utilities to facilitate efficient siting and interconnection.
9. Maintain a 360-degree view of the community solar market and ensure a beneficial role for all parties in the partnerships forged between subscriber, developer, and utility.